



**SEALED**

**Office of the United States Attorney  
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United States District Court  
District of Nevada

FILED

2018 SEP 13 PM 4:52

UNITED STATES OF AMERICA,

Plaintiff

vs.

JIMMY DAVID WASHINGTON, JR,

and

DEMECIA SHONTRES WASHINGTON,

Defendants

U.S. MAGISTRATE JUDGE

BY \_\_\_\_\_  
Magistrate No. 2:18-mj-0798-PAL

**ORDER TO SEAL**

Based on the pending Application of the Government, and good cause appearing therefor, **IT IS HEREBY ORDERED** that the Affidavit, the Government's Application and this Court's Sealing Order, in the above-captioned matter shall be sealed until further Order of the Court.

DATED this 13th day of September, 2018.



UNITED STATES MAGISTRATE JUDGE

FILED

2018 SEP 13 PM 4:52

U.S. MAGISTRATE JUDGE

BY \_\_\_\_\_

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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

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UNITED STATES OF AMERICA,

Plaintiff

vs.

JIMMY DAVID WASHINGTON, JR,

and

DEMECIA SHONTRES WASHINGTON,

Defendants

Magistrate No. 2:18-mj-0798-PAL

**APPLICATION TO SEAL**

COMES NOW the United States of America, by and through Dayle Elieson, United States Attorney, and ELHAM ROOHANI, Assistant United States Attorney, respectfully moves this Honorable Court for an Order sealing the Affidavit, this Application and the Court's Sealing Order, in the above-captioned matter, until such time as this Honorable Court, or another Court of competent jurisdiction, shall order otherwise.

According to Title 18, United States Code, Section 3103a(b)(1) the court may delay any notice required, or that may be required, if there is reasonable cause to believe that providing immediate notification of the existence and execution of the warrant may have

1 an adverse result. In this case, such an order would be appropriate because the attached  
2 Affidavit relates to an ongoing criminal investigation into violation(s) of Conspiracy to  
3 Commit Sex Trafficking, 18 U.S.C. § 1594(c); Sex Trafficking, 18 U.S.C. §§ 1591(a)(1),  
4 (a)(2), (b)(2) and (c) and 18 U.S.C. § 2; Conspiracy to Transport for Prostitution or Other  
5 Criminal Sexual Activity, 18 U.S.C. § 1594(c); Transportation for Prostitution or Other  
6 Criminal, Sexual Activity, 18 U.S.C. § 2423(a) and 18 U.S.C. § 2; Conspiracy to Sexually  
7 Exploit Children, 18 U.S.C. § 2251(a) and (e); Sexual Exploitation of Children, 18 U.S.C. §  
8 2251(a) and (e); and Distribution of Child Pornography, 18 U.S.C. § 2252A(a)(2) and (b);  
9 that is neither public nor known to all of the targets of the investigation, and its disclosure  
10 may alert the targets to the ongoing investigation. Accordingly, there is reason to believe  
11 that disclosure of the information will jeopardize the investigation, including by giving the  
12 Defendants an opportunity to flee, to evade capture, or continue flight from prosecution,  
13 which would thereby put law enforcement lives at risk during the attempt to effectuate  
14 the arrest warrant. Additionally, disclosure of the information would give the Defendants  
15 an opportunity to destroy valuable information that may be contained on mobile devices  
16 and email accounts in their possession and control. Finally, to the extent that there may  
17 be other victims or confederates unknown to the Government at this early stage in the  
18 investigation, disclosure of the information would give the Defendants an opportunity to  
19 tamper with witnesses, change their own behavior, and notify confederates who could also  
20 destroy evidence and change their patterns of behavior.

21 The Government further submits that it is necessary for the Affidavit to be sealed  
22 in light of the fact that the minor victim has returned to her state of residence and the  
23 Defendants, who are currently at liberty and know the identity and home address of the

1 minor victim, may intimidate or otherwise endanger the life or physical safety of the  
2 minor victim.

3 DATED this 13th day of September, 2018.

4 Respectfully submitted,  
5 DAYLE ELIESON  
6 United States Attorney

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8 ELHAM ROOHANI  
9 Assistant United States Attorney  
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